

UNITED STATES DISTRICT COURT
FOR DISTRICT OF MASSACHUSETTSDOCKET NUMBER: ~~03-10303~~01-10165-
MCL

UNITED STATES OF AMERICA

V

DEFENDANT'S MOTION TO CONTINUE

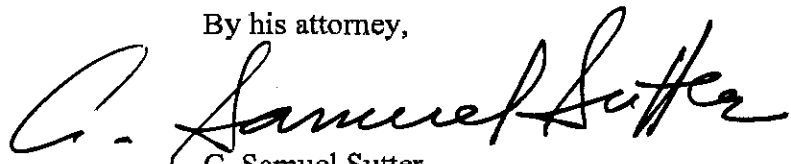
TONY TEIXEIRA

Now comes the defendant, Tony Teixeira, and moves that this Honorable Court continue his trial so that Pre-trial Services may do a preliminary Pre-sentence Report.

As grounds therefore the defendant states that there are several convictions for breaking and entering on his Board of Probation record which fall ^{squarely} ~~square~~ within ambit discussed extensively in the recent case of Shepard v United States. The defendant needs this Report by Pre-trial Services in order to adequately ~~assess~~ ^{assess} whether or not to enter a plea in this case. As further grounds, United States Assistant Attorney Timothy Feeley assents to this continuance.

WHEREFORE, the defendant prays that this Honorable Court continue his trial so that Pre-trial Services may do a preliminary Pre-sentence Report.

By his attorney,



C. Samuel Sutter
203 Plymouth Avenue
Fall River, Massachusetts 02721
Telephone: (508) 674-8633
Facsimile: (508) 673-3766

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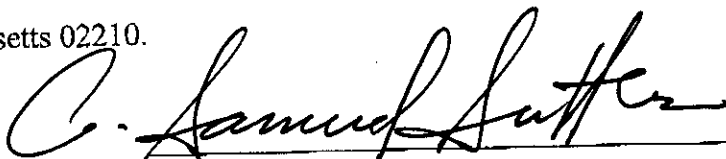
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CERTIFICATE OF SERVICE

TONY TEIXEIRA

I, C. Samuel Sutter, hereby certify that on Monday, May 9, 2005, I hand-delivered a copy of Defendant's Motion to Continue, to United States Attorney Timothy Feeley, or his agent, located at 1 Courthouse Way, Boston, Massachusetts 02210.


C. Samuel Sutter